

# **DRAFT**

## **Developing a Draft Preferred Program Alternative**

CALFED is exploring three basic alternatives (approaches) to solving the problems in the Bay-Delta system. As part of each alternative, there are six common programs (water quality, water use efficiency, ecosystem restoration, levee system integrity, water transfer framework, and watershed coordination) and related assurances, financing, and monitoring that will make up a preferred program alternative. The alternatives also include the potential of water storage and different Delta conveyance configurations. Considering the complexity and large number of items to be completed as part of the CALFED Program, implementation will be conducted in several stages over 30 or more years. The first stage (approximately 7+ years) will consist of actions which can begin to make progress towards meeting CALFED goals. Many of the actions included in subsequent stages will depend on additional scientific information and evidence of need collected during this first stage of implementation.

The following sections outline the components of a draft preferred program alternative, with primary emphasis on the concept of "staged implementation", conditions and linkages which guide initial and future implementation stages, and a list of example Stage I actions. These components can form the basis of a preferred program alternative.

### **Components of a Preferred Program Alternative**

For CALFED to succeed, it must develop a program which both fulfills its mission and has broad support from government agencies and stakeholders. It is likely that stakeholder support will be contingent upon progressing on a number of issues, including the items listed below, **prior** to finalizing the draft preferred program alternative (see Attachment 1 for further description of components). Therefore the "decision" for a draft preferred program alternative must include:

- Conditions/Linkages
- Stage 1 Actions
- Governance and Assurances
- Cost Allocation
- Environmental Documentation
- Water Project Operating Rules

## Staged Implementation

The complexity of the CALFED Program contributes to the need for staged implementation. Each alternative is composed of hundreds of individual actions, and will require decades to fully implement. The challenge in implementing the Program in stages is to allow actions that are ready to be taken immediately to go forward, while assuring that each interest group has a stake in the successful completion of each stage.

Staged implementation for the CALFED preferred program alternative involves identifying certain actions for implementation for which there is general agreement and justification, and also identifying actions where uncertainty exists and developing conditions for moving beyond Stage 1. For the Program actions where uncertainty exists certain predefined conditions would need to be met before actions could proceed. For example, certain conditions would be linked to the decision to construct major facilities. "Conditional decisions" on several Program elements may be required at each stage of implementation.

Decisions on what actions should be part of the draft preferred program alternative fall into three categories:

1. Yes - Proceed with an action based on general agreement that it is part of CALFED solution. Actions are linked to progress in all areas of the Program.
2. No - Reject the action due to failure to meet CALFED objectives and solution principles.
3. Maybe - For the actions where uncertainty or important linkages exist the decision can be structured in two basic ways:
  - Presume action does not proceed unless the other selected actions fail to produce necessary results and specific conditions are met.
  - Presume action proceeds as long as certain linkages are maintained and conditions met.

### Staged Implementation

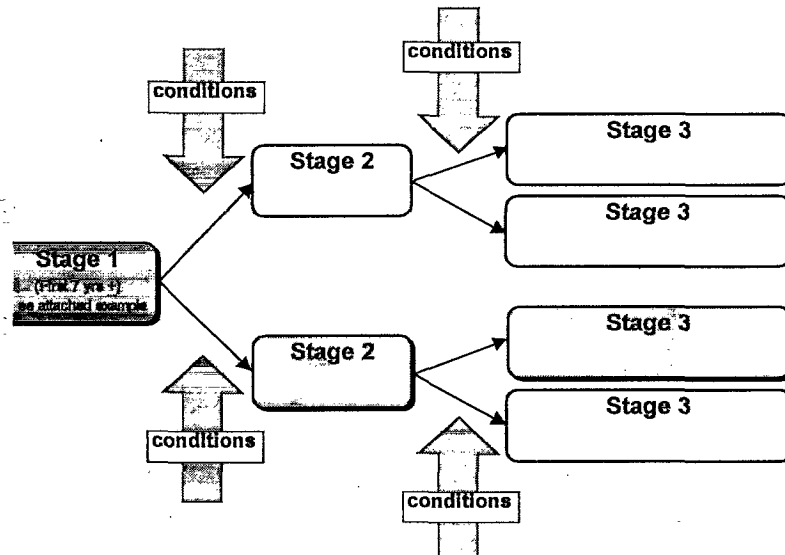
- Identify certain actions at the outset (for all stages).
- Identify possible actions for future stages with associated conditions to guide the decisions. This will allow some decisions when more scientific information will be available and the effects of previous actions will be better known.

### Conditional Decision

For those areas of the program where uncertainty exists, the decision to proceed will be guided by a carefully crafted set of predefined conditions. Conditional decisions determine how the Program moves from stage to stage.

The adjacent diagram is a simplified schematic showing how implementation could progress from one stage to the next with conditional decisions at each stage. Implementation would begin with Stage 1 including a set of actions that provide benefit towards CALFED goals. Stage 1 would also include a set of conditions to guide how the Program would move into subsequent stages.

### Conditional Decisions



For example, currently there is uncertainty on the need for major facilities (isolated facility and surface storage). The most controversial example involves the possible construction of an isolated facility as part of a dual conveyance system. Because of significant uncertainties about (1) the performance of the alternatives and (2) future drinking water standards and diversion effects on fisheries, CALFED may not be able to rule out the need for a dual conveyance facility to achieve its mission. But neither can it conclude, based upon current information, that the facility is absolutely necessary for fulfilling that mission.

In addition, because of the uncertainty, for CEQA and NEPA purposes the major facilities (isolated facility and surface storage) would be included in the preferred Program alternative if there is any conditional possibility of implementing them to achieve Program benefits. However, this is not a commitment to build these facilities. Strict conditions, including site specific environmental documentation and permitting, would need to be satisfied prior to any construction.

### Stage 1 Implementation

Stage 1 is defined as the period extending from certification of the programmatic EIS/EIR to just prior to making a decision whether or not to issue permits for the major storage and conveyance facilities.

This first stage begins a series of actions that will ultimately form the CALFED solution. The first stage does not set a direct path to any specific predefined solution but begins a process where the solution can change depending on the outcome on predefined conditions. The first stage can lead to an Alternative 1, 2, or 3 or another preferred alternative depending on how the predefined conditions are met.

In order to succeed:

- Stage 1 must begin the commitment for improvement in all resource areas for the Bay-Delta system.
- Stage 1 must provide stability in the water resources management framework until actions in subsequent stages substantively reduce conflicts in the system. This can initially be achieved by an extension and/or expansion of conditions in the 1994 Bay-Delta Accord.

The *DRAFT Example Stage 1 Implementation* (Attachment 2) provides potential actions for each CALFED Program element. It includes studies, site specific environmental documentation, and permitting work for conveyance and storage facilities but does not include commitments to build them.

## Potential Conditions/Linkages for Future Decisions

Discussion is beginning on some potential conditions and linkages for a draft preferred Program alternative. There are many potential linkages between the various actions in the common program elements, storage, and conveyance.

Based on extensive stakeholder input over the last three years we are developing a proposed approach to crafting the draft preferred program alternative. There is broad agreement on proceeding with the common programs with implementation of those programs linked to reasonable progress in all resource areas. However, for the storage and conveyance elements of the Program, there is uncertainty on the need for major facilities. Therefore, we have proposed in general terms a series of predefined conditions which need to be met in order to proceed with storage and conveyance actions. As described earlier, for those actions where sufficient uncertainty exists, a decision can be structure in two ways; (1) presume action does not proceed unless certain conditions occur, or (2) presume action proceeds if certain conditions occur.

The following linkages and conditions are proposed to facilitate discussion among agencies and stakeholders:

1. **Program linkages.** Progress in one resource area needs to be linked to progress in all other elements of the preferred Program alternative. Presume the actions in Stage 2 proceed if there is reasonable progress for all resource areas in Stage 1
2. **Conveyance.** Presume an optimized Delta conveyance alternative is implemented based on the existing Delta configuration or modifications of Delta channels if adequate protections are achieved for fisheries and water quality. An isolated facility will only be considered if there is:

- a. Public health mandate for reduced bromide levels that cannot be addressed more economically by source water improvements or improved water treatment and/or there is continued fishery decline tied to water exports which can only be addressed by significant reduction in south Delta pumping.
- b. Limit on the amount of water that can be exported (linked to water year type).
- c. Commitment (legislative or contractual) to use excess excavated material from facility construction for levee and habitat improvements.
- d. Commitment (Delta standards or contractual) to preserve in-Delta water quality.
- e. Commitment to address potential seepage from the isolated conveyance facility.
- f. Commitment to address potential flood impacts along the facility alignment.
- g. Long-term funding for Delta levees (perhaps tied to quantity of water moved in the isolated facility).
- h. Commitment (legislative) that construction of isolated facility cannot proceed ahead of construction of new regional surface storage.
- i. Site specific environmental documentation and permitting completed.
- j. Demonstrated willingness to finance by beneficiaries.

3. **Water Export Regulations.** Presume water export regulations are revised if:

- a. Significant changes in the Delta conveyance configuration and condition of the ecosystem occurs.

4. **Surface Storage.** Presume surface storage is constructed if:

- a. Defined progress for the water use efficiency program is achieved. Users of new water supplies must meet specific, measurable efficiency criteria and demonstrate that water available through marketing is appropriately incorporated into the source mix prior receiving new water supplies.
- b. Demonstrated need for surface storage (for urban, agricultural, or environmental uses) with water transfer market and water use efficiency measures in place.
- c. Site specific environmental documentation and permitting completed.
- d. Demonstrated willingness to finance by beneficiaries.

5. **Groundwater/conjunctive use programs.** Presume north of Delta groundwater/conjunctive use programs are not implemented unless:

- a. Progress is being made on north of Delta surface storage.
- b. Baseline groundwater monitoring, and groundwater modeling is established.

## Components of a Draft Preferred Program Alternative

- **Cost Allocation** - Financing cost allocation strategy that outlines how Program implementation will be funded (specific agreements will be finalized in Stage 1)
- **Environmental Documentation** - Document compliance with applicable environmental documentation requirements at the programmatic level including:
  - Conservation strategy for ESA including "safe harbor" protections for property owners (refinement will continue in Stage 1)
  - 404(b)(1) Guidelines
  - Other Acts, Executive Orders, and state/regional/ local plan consistency
- **Operating Rules** - Agreement on interim water project operating rules (final rules will be determined in Stage 1)
- **Governance and Assurances** - Agreement on the framework for the assurances (the assurances will be finalized in Stage 1)
  - How agencies will coordinate or the need for a new agency
  - Forum for stakeholder involvement
  - Final contingency response process for unforeseen circumstances
  - Framework for the many other assurances in the package
- **Stage 1 Actions** - Agreement on the set of actions for Stage 1 (see below and attachment for examples)
- **Conditions/Linkages** - Agreement on the conditions and linkages to guide progress from one stage of implementation to the next (see below for examples)

These will be more fully developed as parts of the preferred Program alternative for the *Revised Draft Programmatic EIS/EIR* in late 1998 and for the *Final Programmatic EIS/EIR* in late 1999.

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### **Example Stage 1 Implementation** (Approximately First 7+ Years of Implementation)

Stage 1 is defined as the period extending from certification of the programmatic EIS/EIR to just prior to making a decision whether or not to issue permits for the major storage and conveyance facilities. Agreement on Stage 1 actions is only one part of the decision for a preferred program alternative.

The following pages provide more detail on potential actions for Stage 1. The list of actions is intended as a starting point for discussions on potential Stage 1 implementation and **will be frequently refined and updated** with input from CALFED agencies and stakeholders. These actions will be more fully developed as parts of the preferred program alternative for the *Final Draft Programmatic EIS/EIR* in late 1998 and for the *Final Programmatic EIS/EIR* in late 1999.

*Each potential action in the following list includes an estimate (in parenthesis) of when the action may occur within Stage 1. For example, "(yr 1)" indicates the action will occur in the first year following certification of the EIS/EIR.*

#### **Assurances**

*An assurances package is a set of actions and mechanisms to assure that the Program will be implemented and operated as agreed. The assurances package will include mechanisms to be adopted immediately as well as a contingency process to address situations where a key element of the plan cannot be implemented as agreed.*

- Complete programmatic implementation plan (yr 1)
- Establish coordination between agencies or new agency (yr 1-3); e.g., provide for ecosystem restoration authority within the individual CALFED agencies or in a new organization with responsibility for ecosystem restoration
- Implement a CALFED environmental documentation and permit coordination process (yr 1-7)
- Introduce state and/or federal legislation if necessary for new institutional arrangements or Program implementation (yr 2-3); e.g., legislation to modify water transfer law and statutes to facilitate an appropriately protective water transfer framework
- Refine conservation strategy (yr 1-3)
- Implement contingency response as needed (yr 1-7)
- Negotiate assurances package and operational rules (yr 1-3)

## Finance

*The financial package will seek to finance the preferred program alternative through a combination of federal, state, and user funds.*

- Establish reliable short-term and long-term funding for each Program element (1-7)
  - Finalize cost share agreements (yr 1)
  - Establish user fees (yr 1)
  - Seek federal authorization/appropriation and seek authority to sell state bonds (yr 1-7)

## Monitoring

*Establish monitoring for all program elements that focuses on obtaining data on a timely basis, providing interpretation of data, and maintaining data in an accessible and useful form.*

- Refine monitoring plan including all elements of the Program (yr 1)
- Implement monitoring plan (yr 1-7)
- Annual reports on status/progress (yr 1-7)
- Analysis of status and need for adjustments in stage 2 (yr 5-7)
- Feedback available on actual diversion effects of south Delta pumps (yr 2-7)
- Feedback available on need to reduce bromides (yr 5)

## Water Transfer Framework

*The water transfer framework is designed to improve the efficiency of the water transfer process. This will facilitate development of a statewide water transfer market while providing protection from third party impacts and local groundwater or environmental impacts.*

- Establish clearinghouse to ensure public participation and disclose information, perform analysis of transfer impacts, and evaluate monitoring of actual transfer impacts (yr 1)
- Continue clearinghouse functions to provide information on environmental, economic and water resource protections (yr 2-7); e.g., third party impacts, groundwater resource protection, instream flow [1707] transfers, environmental protection in source areas, area of origin/watershed priorities, and rules/guidelines for environmental water transfers
- Establish technical, operational, and administrative rules that govern water transfer transactions (yr 1-4); e.g., transferable water and the "no injury rule", operations criteria and/or carriage water requirements, reservoir refill criteria, and streamlined permitting process
- Establish disclosure process that provides information regarding potential access to state

and federal water facilities for movement of water transfers (yr 2); e.g. priority of transferred water in existing project facilities, priority of transferred water in new facilities, wheeling costs

## Water Use Efficiency

*The CALFED water use efficiency element focuses on formulation of policies which support implementation of efficiency measures at the local and regional level. The policy is a reflection of the State of California legal requirements for reasonable and beneficial use of water.*

- Expand DWR and USBR programs to provide technical and planning assistance to local agencies (yr 1-7) and explore new ways of developing assistance and involving other CALFED agencies
- Introduce state legislation (amend the water code) to give DWR approval authority for urban water management plans (yr 1-3); e.g., approved plans would be a condition for urban areas receiving CALFED benefits
- Review and approve urban water management plans (yr 1-7); assumes DWR has overall authority but that approval of plans for best management practices (under urban MOU) would be deferred to Urban Council as shown in the following two bullets
- Introduce state legislation to give Urban Council authority to certify water agency implementation plans (under urban MOU) for best management practices (yr 1-3)
- Implement urban MOU process fully with certification of agency implementation plans (yr 3-7)
- Implement the Agricultural Water Management Council (AB 3616) process fully with endorsement of agency plans (yr 1-7); e.g., rely on Council to endorse plans of signatory member agencies as condition for receiving CALFED benefits, explore additional ways to build consensus on the process
- Seek resolution to legal, institutional, and funding limitations for water recycling (yr 1-3)
- Participate in conservation and water recycling demonstration projects (yr 3-7); e.g., funding assistance for projects providing multiple CALFED benefits such as agricultural tail water recycling which could benefit fish by reducing diversions, reduce pollutant loading, etc.

## Levees

*The focus of the long-term levee protection element of the Program is to reduce the risk to land use and associated economic activities, water supply, infrastructure, and the ecosystem from catastrophic breaching of Delta levees.*

- Obtain short-term federal and state funding authority as a bridge between the existing Delta Flood Protection authority (AB360) and long-term levee funding (yr 1-5)
- Obtain long-term federal and state funding authority (yr 6-7); e.g., the Corps of Engineers' current "Special Study" could develop into a long-term Delta levee reconstruction program and the state could be the local cost sharing partner
- Establish federal, state, and local cost sharing percentages (yr 1)
- Project level environmental documentation and permitting as needed (yr 1-7)
- Develop levee designs that minimize the need for continuous disruption of habitat from levee maintenance and minimize the need for ongoing mitigation from disrupted habitat (yr 1-7)
- Fund levee improvements up to PL84-99, approx. \$114 million [\$74 million during years 1 through 5 and \$40 million during years 6 through 7] in first stage (yr 1-7); e.g., proportionally distribute available funds to entities making application for cost sharing of Delta levee improvements
- Further improve levees which have significant statewide benefits approx. \$82 million [\$58 million during years 1 through 5 and \$24 million during years 6 through 7] in first stage (yr 1-7) ; e.g., statewide benefits to water quality, highways, etc.
- Coordinate Delta levee improvements with ecosystem improvements (yr 1-7)
- Coordinate Delta levee improvements with Stage 1 water conveyance improvements and with potential conveyance improvements in subsequent stages (yr 1-7)
- Institute Emergency Management Plan (yr 1-7); e.g., establish \$10 million revolving fund, refine command and control protocol, preposition flood fighting supplies, establish standardized contracts for flood fighting and recovery operations
- Initiate a subsidence control program to develop and implement BMP's, approx. \$11 million for Stage 1 (yr 1-7)

## Ecosystem Restoration

*Ecosystem restoration is designed to improve and increase aquatic and terrestrial habitats and improve ecological functions in the Bay-Delta to support sustainable populations of diverse and valuable plant and animal species. The Stage 1 restoration efforts are a continuation of existing CALFED ecosystem efforts and focus on reducing direct mortality. Capital outlays may approach \$150 million per year; subsequent stages would likely require less funding. The initial focus of restoration activities will be on existing public lands.*

- Project level environmental documentation and permitting as needed (yr 1-7)
- Establish a partnership with a university and fund focused research (yr 1-7); e.g., hatchery management research
- Identify funding source for ongoing inflation indexed operational funds
- Continue high priority actions that reduce stressors of direct mortality (yr 1-7):
  - Begin screening Sacramento River and tributary diversions less than 100 cfs
  - Screen 10-15 San Joaquin River and tributary diversions greater than 100 cfs
  - Facilitate decisions on harvest management; e.g. work with Pacific Fishery Management Council for marking of hatchery product and requirements for anglers to return unmarked fish
  - Remove select physical barriers to fish passage
- Implement demonstration projects for habitat improvement
  - Demonstration projects for habitat restoration of approximately 6000 to 7000 acres (riparian, tidal wetlands, seasonal wetlands, wildlife friendly agricultural practices, etc. for fish and wildlife) along the South Fork Mokelumne River corridor; e.g., Canal Ranch, Brack Tract, McCormack Williamson Tract, easements on Staten Island (if willing local participants)
  - Demonstration projects for habitat restoration (riparian, tidal wetlands, regrading to reduce fish stranding, etc. for fish and wildlife) in Yolo Bypass corridor; e.g., easements along Tule Canal, some acquisitions along Cache Slough, acquire Little Holland, management direction for Liberty and Prospect Islands
  - Demonstration projects for habitat restoration (riparian, attached berms and shallows, etc. to provide more shading, refuge, and residence time) along the mainstem San Joaquin River corridor within the legal Delta
  - Coordinate ecosystem improvements with Delta levee improvements for the South Fork Mokelumne River corridor, the Yolo Bypass corridor, the San Joaquin River corridor, and with other levee improvements that provide habitat connectivity and value to overall ecosystem restoration plan; avoid habitat improvements along corridors that could become water conveyance corridors in subsequent stages

- Incorporate ecosystem improvements with subsidence reversal plans (yr 1-7)
- Begin development of ecosystem water market (potentially \$20 million per year), after an appropriately protective water transfer framework has been established (yr 1-7); e.g., acquire 100,000 acre-feet on long-term basis and plan for other short-term purchases
- Begin purchase of Sacramento River meander corridor easements [primarily easements with some acquisitions and habitat restoration] (yr 3-7)
- Develop habitat restoration on public lands where restoration of CALFED objectives is feasible (yr 1-7); e.g., management direction for existing public lands on Twitchell and Sherman Islands
- Begin select Sacramento River corridor habitat restoration (yr 3-7)
- Continue flood plain easements along San Joaquin River (yr 4-7); e.g., there may be more opportunities for easements if Corps of Engineers proceeds with flood plan
- Continue gravel management (yr 5-7); e.g., isolate gravel pits on San Joaquin River tributaries and relocate gravel operations on Sacramento River tributaries (most gravel work would be implemented in subsequent stages with designs and plans for ecosystem reclamation of gravel mining sites)
- Improve monitoring, detection, and control of exotic species (yr 1-7); e.g., border inspections, balanced management, water hyacinth control, funded early response
- Continue scientific evaluations (yr 1-7)
- Willing seller land acquisition for multiple uses (yr 2-7)

## Water Quality

*The Stage 1 water quality effort focuses on reducing toxicity for the ecosystem and water users.*

- Project level environmental documentation and permitting as needed (yr 1-7)
- Develop educational programs relating to urban and agricultural runoff (yr 2-7); e.g., point-of-sale literature packaged with pesticide and herbicide materials, educate applicators on proper use of pesticides and herbicides, etc.
- Initiate high priority water quality improvement actions; e.g. for mercury, copper, selenium, pesticides (yr 3-7)
- Studies/testing/pilot evaluations (yr 1-7); e.g., research Cache Creek mercury issues including habitat restoration potential for contributions to methyl mercury formation, research ecological effects of toxicants
- Implementation of needed actions based on results of the studies/testing/pilot evaluations (yr 3-7)
- Participate in toxic site remediation if federal "Good Samaritan" protections are obtained (yr 3-7)

## Watershed Management

*This program element is primarily a coordination effort with local watershed groups. The watershed coordination element also provides a focus for public participation for other Program elements. CALFED will participate where proposed watershed actions provide a strong link to critical Delta problems; expect \$10 million to \$15 million annually. The implementation ownership of the watershed work is with the local groups.*

- Develop a coordination framework to define roles and ensure effective communication among state, federal, local government, and stakeholder groups (yr 1); e.g., \$ and coordination to help local resource conservation districts develop consistent standards
- Develop a plan to foster local watershed groups (yr 1-2); e.g., formal MOU or other agreement with functional groups in each ecological zone of ERPP (such as Yolo Basin Foundation, Deer Creek Conservancy, etc.)
- Provide stewardship funds to foster local watershed groups (yr 1-7)
- Select a university to manage technical input to a clearinghouse function (yr 1)
- Establish clearinghouse to assist watershed groups with information about funding opportunities, technical assistance, and project implementation (yr 1); e.g. continuous review and input to existing watershed inventories, databases
- Develop performance measures which show the level of success or failure for use in adjusting future watershed participation (yr 1-2)
- Identify priority watersheds in terms of solutions to problems affecting the Bay-Delta estuary and develop implementation schedule tied with other Program elements (yr 2-7); e.g., priorities for fire control, meadow restoration vegetation management, protecting source water quality, reduce erosion, control exotic species, etc.
- Identify funding opportunities (pool agency money, grants, cost share, etc.) to provide incentives to local level for select upper watershed projects (yr 2-7); e.g., Plumas County, Placer County, El Dorado County, etc.

## **Groundwater Banking and Conjunctive Use**

*This element is primarily a coordination effort with local implementing entities.*

- Develop and implement a framework for conjunctive use (yr 1)
- Provide funding assistance for groundwater plan development (yr 1-7)
- Identify local cooperating entities and CALFED role (yr 1-3)
- Initiate baseline monitoring and modeling (yr 1-5)
- Initiate demonstration project (yr 1); e.g., American Basin
- Initiate field and pilot studies (yr 2-7)
- Project environmental documentation and permitting (yr 3-7)
- Designs (yr 4-7)
- Construct 2 to 3 facilities (yr 5-7); e.g. Madera Ranch, expanded Kern water bank

## Surface Storage

*The first stage of this element will primarily consist of studies and evaluations necessary prior to final permitting. This will allow surface storage projects to be ready for permitting and construction in later stages should the projects be selected for implementation.*

- Identify local cooperating entities and CALFED role (yr 1-3)
- Environmental documentation (yr 1-5)
- Feasibility studies (yr 1-5)
- Field and pilot studies (yr 1-5)
- 404(b)(1) analyses; project site screening, least cost evaluations, and equivalency analyses (yr 1-5)
- Site selection (yr 5-6)
- Permits and operating agreements (yr 5-7)
- Evaluate improvements to Tehama Colusa Canal and others (yr 1-5)

## Conveyance

*Much of the first stage of this element will consist of studies and evaluations necessary prior to final permitting. This will allow conveyance projects to be ready for permitting and construction in later stages should the projects be selected for implementation. Some construction on the South and North Delta improvements could occur within the first stage.*

### South Delta Improvements (Alts. 1, 2, and 3)

- Complete environmental documentation and permitting (yr 1-2)
- Design south Delta improvements (yr 1)
- Construct south Delta improvements [expand permitted south Delta pumping capacity from 11,000 to 15,000 cfs] (yr 2-4)
- Construct fish screen demonstration project for Tracy Pumping Plan (yr 1)
- South Delta screening demonstration project (yr 2-6)
- Project environmental documentation and permitting for SWP/CVP intertie (yr 2-4)
- Design SWP/CVP intertie (yr 5-6)

### North Delta Improvements (Alt. 2 and possibly Alt. 3)

- Project environmental documentation (yr 1-6)
- Feasibility studies (yr 1-6)
- Field and pilot studies (yr 1-6)
- Environmental documentation for land acquisition (yr 2-3)
- Land acquisition (yr 4-6)
- Permits and operating agreements (and permitting) (yr 4-6)

- Design of select improvements (yr 7)
- Pilot studies for dredge material reuse (yr 1-7)

**Isolated Facility** (Alt. 3); CALFED cannot totally preclude the potential of an isolated facility at this time. However, the presumption is that the isolated facility will not be implemented. The following Stage 1 actions provide progress on initial studies and permitting incase the isolated facility is found necessary to meet CALFED objectives.

- Project environmental documentation (1-7)
- Feasibility studies (yr 1-6)
- Field and pilot studies (yr 1-6)
- Permits and operating agreements for isolated facility (yr 7+)